

In the Drawings:

Please replace Original Sheets "7 of 8" and "8 of 8" with the enclosed two "Replacement Sheets" bearing Figs. 15, 16 and 17. In the sectional views of Figs. 16 and 17, the sectional cross-hatching has been corrected to show the electrically insulating portions with alternating thick and thin diagonal lines, as required by the Examiner. This conformance to typical drawing standards does not introduce any new matter. All other original figures and sheets remain unchanged and without replacement.

**[RESPONSE CONTINUES ON NEXT PAGE]**

REMARKS:

1) The specification has been amended in the last two paragraphs of page 11 to more-clearly and expressly describe certain features now recited in the independent claims, as originally shown in the drawings, for example see Figs. 2 to 7, 13 and 14. Merely describing in the specification what is shown in the original drawings does not introduce any new matter. Entry of the specification amendments is respectfully requested.

2) The claims have been amended as follows.

Independent claim 1 has been amended to make clear that the two latch arms extend directly from the receptacle connector body outward in the depth direction, and that each latch arm is provided with a retaining part that projects inward in the width direction at an outer free end of the latch arm extending in the depth direction. These features are supported in the original disclosure, for example relating to Figs. 2 to 7, and see the specification, for example at page 11, last two paragraphs, as amended.

Independent claim 20 has been amended to clarify similar features mentioned above regarding the amendment of claim 1.

Since these features are clearly shown in the original drawings, incorporation thereof in the claims does not introduce any new matter. Entry and consideration of the claim amendments are respectfully requested.

- 3) Referring to the middle of page 2 of the Office Action, the drawings have been amended to use the proper sectional cross-hatching for insulating portions, namely using alternating thicker and thinner diagonal lines, in Figs. 16 and 17. In view of the drawing amendment, please withdraw the objection to the drawings.
- 4) Referring to pages 3 and 4 of the Office Action, the rejection of claims 1, 2, 13, 18, 20 and 21 as obvious over US Patent 6,565,389 (Igarashi) in view of US Patent 6,663,407 (Pickles) is respectfully traversed.

Applicants' remarks regarding the combination of Igarashi and Pickles as set forth in the prior Response of November 18, 2005 are incorporated herein by reference and reasserted.

The Examiner's "Response to Arguments" at pages 6 to 8 of the new Office Action is appreciated and has been taken into account.

First, it is respectfully submitted that applicant's arguments did not merely address the references individually but also in combination. Of course, initially one must discuss the disclosure of each reference individually, in order to explain what is disclosed by the respective reference. Then, however, the prior arguments discussed how those disclosures of the references would have been considered in combination by a person of ordinary skill in the art. For example, see the last paragraph of remark section 4), the last paragraph of remark section 5), and the last paragraph of remark section 6) of the prior Response. Further, it is noted that the Examiner has

discussed each reference individually, and then made a statement regarding the combination of the references, in a similar format as followed in the applicants' remarks.

Regarding a suggestion to provide a latching structure. please note that NO prior art reference provides such a suggestion toward a latching structure for a plug-connector connected to an electric wire or flexible cable.

Igarashi discloses a plug-connector for a flexible cable, but does not disclose or suggest that there is a need for a latching structure for such a plug connector. Igarashi does not disclose or suggest any problem that must be addressed or overcome by providing a latching structure for such a plug connector for a flexible cable. So, while Igarashi relates to a plug connector for a flexible cable, Igarashi does not disclose or suggest any sort of latching structure for such a plug connector.

On the other hand, Pickles discloses a card edge connector for connecting to a circuit card. In this regard, Pickles discloses a need for a latching structure to securely latch the circuit card to the card edge connector. The problems to be solved by Pickles relate to the secure connection and latching of a circuit card to a card edge connector and do not relate to securing or latching a plug connector for a flexible cable. Pickles would not have provided any suggestion or motivation regarding problems to be solved for a plug connector for a flexible cable, or toward providing a latching structure for a plug connector for a flexible cable, because Pickles does not

disclose and does not have anything to do with a plug connector for a flexible cable.

From a combined consideration of the Igarashi and Pickles references, a person of ordinary skill in the art would thus learn that a plug connector for a flexible cable does NOT need a latching structure, while a card edge connector DOES need a latching structure. Those are the teachings of the two references, and there are no other or contrary teachings of record. The Examiner has not shown any prior art disclosure of a problem or need relating to a plug connector for a flexible cable that would have suggested or motivated the provision of a latching structure on such a plug connector. On the other hand, a latching structure for a card edge connector would not serve the same purpose and would not solve the same problems in the different context of a flexible cable plug connector.

At page 7 line 6 of the Office Action, the Examiner has emphasized that *"the rejection defines the supporting (sic:latch) arms as elements 16 and not 14 as argued by the applicant"*. This re-emphasis is appreciated, and has been taken into account into the present amendment. In the prior Office Action, the undersigned believed that there might be a typographical error in the reference number (16), actually intending (14), because element (16) has even less similarity than element (14) to the presently claimed latch arms. In any event, for the reasons explained in the prior Response, the supporting arms (14) of the latch structure according to Pickles would not have suggested the presently claimed latch arms, because the supporting arms (14) are not laterally deflectable

in the width direction. Now, it will be explained why the disclosed latch (16) of Pickles would not have suggested the presently claimed latch arms.

In present independent claims 1 and 20, it has been made clear, that the two latch arms extend directly from the receptacle body outwardly in the depth direction. Furthermore, claims 1 and 20 have been amended to make expressly clear that a retaining part is provided at an outer free end of the latch arm extending in the depth direction, and this retaining part includes a portion configured to generate a component force acting outwardly in the width direction.

These features of the present latch arms are expressly distinguishable from the latches (16) according to Pickles. Contrary to the present independent claims, the latches (16) of Pickles do NOT extend directly from the receptacle body outwardly in the depth direction. Instead, the latches (16) extend upwardly in the thickness direction from the supporting arms (14).

Further contrary to the present independent claims, the alleged retaining part (164) of Pickles does **NOT** project inward in the width direction at an outer free end of the latch arm (allegedly 16) extending in the depth direction. Instead, the alleged retaining part (164) projects inwardly in the width direction from an upper free end of the alleged latch arm (16) extending in the thickness direction.

Thus, from the above comparison, it is clear that the arrangement, connection, and orientation of the latch tab (164) and the latch (16) according to Pickles is significantly

different from the arrangement, connection and orientation of the latch arms and retaining parts according to the present independent claims.

Furthermore, the Examiner has acknowledged that Igarashi does not disclose a pair of latch arms as presently claimed. In that regard, the Examiner turned to the above-discussed Pickles reference.

Since Igarashi does not disclose the present pair of latch arms (as acknowledged by the Examiner), and Pickles discloses a very-different structure and arrangement (as discussed above), even a combined consideration of the two references would not have suggested the presently claimed construction. Namely, because both references are completely devoid of any suggestion toward the present arrangement and orientation of the latch arms extending directly from the receptacle body outwardly in the depth direction, and a retaining part provided at an outer free end of the latch arm extending in the depth direction, even a combination of the references could not have provided any suggestions in this regard.

For the above reasons, the respective inventions of claims 1 and 20 would not have been obvious over a combination of Igarashi and Pickles. The dependent claims are patentable already in view of their dependence. Please withdraw the obviousness rejection applying Igarashi and Pickles.

- 5) Referring to page 4 of the Office Action, the rejection of claims 4, 8, 15, 16 and 22 to 24 as obvious over Igarashi and Pickles,

and further in view of US Patent 6,565,383 (Wu) is respectfully traversed.

Applicant's remarks in this regard in the prior Response of November 18, 2005 are incorporated herein by reference and reasserted.

Regarding the Examiner's further comments that "*Figures 7 and 8 of Pickles show arms that are not integrally molded of plastic*", it is respectfully pointed out that Figs. 7 and 8 also involve supporting arms that extend outward in the depth direction from the receptacle body and that are integrally molded of insulating plastic, and additionally a pair of latch members (30') made of metal that are attached to the outer free ends of the support arms. These metal latch members (30') have a configuration, construction and arrangement significantly different from the presently claimed latch arrangement. Also, it remains critical to provide an insulating arm that extends between the receptacle body and the latch structure, to avoid short-circuiting as previously explained. Thus, the further comments regarding Wu in the prior Response are still applicable and are reasserted here.

For the above reasons, the Examiner is respectfully requested to withdraw the obviousness rejection applying Igarashi, Pickles and Wu.

- 6) Referring to page 5 of the Office Action, the rejection of claims 12, 14 and 19 as obvious over Igarashi, Pickles and US Patent 6,361,358 (Kajinuma) is respectfully traversed. Applicants' remarks in this regard in the prior Response are incorporated



herein by reference and reasserted. The teachings of the references cannot be taken out of context. The fact that Kajinuma might provide a structure allegedly suggesting a concave part at corners of a conductive supporting plate mounted on the edge of a circuit board, would not have provided any suggestion toward providing such concave parts at the corners of an insulating plug connector as presently claimed. When a person of ordinary skill in the art is told to put concave parts on a conductive member purposely to provide a continuous ground contact and shielding assembly (see Kajinuma col. 1 lines 15 to 23 and 60 to 63; col. 2 lines 53 to 56; col. 5 lines 39 to 54), such teachings would not have motivated the person of ordinary skill to arrange concave parts on an insulating body of a connector, because they could not have achieved the intended purposes thereof according to Kajinuma. For the above reasons, and the reasons previously asserted, the Examiner is respectfully requested to withdraw the obviousness rejection applying Igarashi, Pickles and Kajinuma.

- 7) Referring to page 5 of the Office Action, the rejection of claims 17 and 25 as obvious over Igarashi, Pickles, Wu and Kajinuma is respectfully traversed. Applicants' remarks in this regard in the prior Response are incorporated herein by reference and reasserted. The above discussions of the four references are also pertinent here. Since none of the references provide suggestions toward the features of claims 17 and 25, even a combination of all four references could not have suggested such features. Also, claims 17 and 25 depend from claims 1 and 20,

and are patentable already for that reason. Please withdraw the obviousness rejection applying Igarashi, Pickles, Wu and Kajinuma.

- 8) Favorable reconsideration and allowance of the application, including all present claims 1, 2, 4, 8 and 12 to 25, are respectfully requested.



Respectfully submitted,  
Keiji KURODA et al.  
Applicant

WFF:he/4598  
Enclosures:  
Transmittal Cover Sheet  
Drawing Transmittal Letter  
2 Replacement Sheets drawings  
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I hereby certify that this correspondence with all indicated enclosures is being deposited with the U. S. Postal Service with sufficient postage as first-class mail, in an envelope addressed to: COMMISSIONER FOR PATENTS, P.O. BOX 1450, ALEXANDRIA, VA 22313-1450 on the date indicated below.

Walter F. Fasse 4/24/06  
Name: Walter F. Fasse - Date: April 24, 2006